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October 19, 2018

Via CM-ECF

Honorable Douglas R. Arpert, U.S.M.J.
Clarkson S. Fisher Federal Bldg. & U.S. Courthouse
402 E. State Street
Trenton, NJ 08608

Re: **Lawson, et al. v. Praxair, Inc., et al.**
Civil Action No. 3:16-cv-02435-BRM-DEA

Dear Magistrate Judge Arpert:

I write this letter as a follow up to another of the issues raised during the conference before Your Honor on September 19, 2018.

As the Court may recall, and as memorialized in paragraph 12 of the parties' joint letter to the Court of September 21, 2018, (Doc.#155) all counsel have conferred about a joint proposal for a new case schedule. I am pleased to advise that the parties have agreed on the following deadlines (based on the events listed in the current Scheduling Order (Doc.#99)):

Electronic Discovery to be substantially complete by December 31, 2018;

Fact Discovery to be complete by July 31, 2019;

Plaintiffs' expert disclosures and reports to be served by September 30, 2019;

Defendants' expert disclosures and reports to be served by October 31, 2019;

Third-Party Defendants' expert disclosures and reports to be served by November 29, 2019;

Expert depositions to be complete by January 14, 2020 (the parties will use their best efforts to meet this deadline, but may request a short extension of that date if scheduling around the holidays becomes impractical).

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The parties suggest that we reconvene with the Court during the weeks of January 14, 2019 or January 21, 2019.

Counsel for all parties have reviewed this letter and join in it.

Respectfully submitted,

/s/ Jeremy D. Mishkin
Jeremy D. Mishkin
Admitted *pro hac vice*

cc: All counsel of record (via email)